

Approval of the Application by National Centre for Public Accreditation (NCPA) for Inclusion on the Register

Register Committee

Ref. RC16/2015/A21

Ver. 1.0

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Application of: 27/01/2015
External review report of: June 2014

Review coordinated by: ENQA

Review panel members: Riitta Pyykkö (chair), Patrick van den Bosch

none

(secretary), Oana Sarbu, Jean-Pierre Finance

(academic), Asnate Kažoka (student)

Decision of: 17 November 2015

Registration until: 30 June 2019

Absented themselves

from decision-making:

- The application of 27/01/2015 adhered to the requirements of the EQAR Procedures for Applications.
- The Register Committee considered the external review report of June 2014 on the compliance of NCPA with the European Standards and Guidelines (ESG).
- 3. The Register Committee further considered NCPA's comments on the external review report as well as clarification from the coordinator of the external review (letter of 04/05/2015) and from NCPA (letter of 05/05/2015).
- 4. On the basis of the above-mentioned documentation the Register Committee was unable to conclude on NCPA's substantial compliance with the ESG. The Committee therefore invited the agency (on 11/06/2015) to make additional representation on the grounds for a possible rejection of its application.
- 5. NCPA made additional representation on 24/07/2015. The Register Committee subsequently considered the application taking into account the representation and further clarification from NCPA (letter of 10/15/2015).

Analysis:

6. With regard to the specific European Standards and Guidelines, the Register Committee considered the following

ESG 2.6: Follow-up procedures

7. The Register Committee noted that public accreditation by NCPA is a voluntary procedure. The review report stated that institutions are asked to submit a report on the implementation of the recommendations they



received within two years of the review. The submission of such reports is not compulsory and does not have any formal consequences. According to the review report NCPA believes that implementing these recommendations is the responsibility of the higher education institutions (p. 19).

In its additional representation NCPA explained that follow-up procedures were developed in light of Russian legislation and with the aim that public accreditation should not duplicate state accreditation, which is obligatory for all institutions, in order to avoid additional burden to higher education institutions.

While the Register Committee acknowledged that the legal framework influences the way in which follow-up procedures are organised it underlined that NCPA should ensure that they are consistently implemented, in particular in cases where the institution might not re-apply for accreditation. This issue has therefore been flagged.

ESG 3.6: Independence

8. The review report stated that NCPA's main decision-making body is the National Accreditation Board. Its members are elected at the General Meeting of the Founders and approved by the National Conference of the Guild of Experts (p. 13). The Guild of Experts played a key role in the establishment of NCPA and is currently involved in the agency's selection and training of external review experts (p. 13 and p. 18). The Register Committee noted that the review report provides limited analysis of the role of the Guild of Experts in relation to the independent operations of the agency.

Based on its interviews, the review panel stated that among the members of the National Accreditation Board and the NCPA coordinators there were no current rectors and presidents of higher education institutions (p. 25). NCPA's self-evaluation report, however, stated that the Board was composed of 25 members, including representatives of legislative bodies of the Russian Federation, rectors and presidents of Russian higher education institutions.

The Register Committee sought clarification on these matters from the Chair of the review panel.

In its letter of 04/05/15 the Chair explained that the panel did not meet any Board member during the site visit that was also a rector, which might have led to the mistake in the review report. With respect to the Guild of Experts' role in the agency's operations, the panel viewed the Guild as having a positive and central role in the development of trainings and procedures of NCPA. Due to its large size the panel did not see the Guild as a threat to the independence of NCPA.

In its representation of 24/07/2015 NCPA explained that the Guild of Experts is only one of a number of other organisations (along with the Russian Union of Students, Union of Industrialists and Entrepreneurs) that

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nominate experts. The final composition of review panels is approved by the Director of NCPA without influence by third parties.

NCPA explained that, according to the Regulations of the National Accreditation Board, Board members with a conflict of interest "shall not participate in the voting" on the cases in question. The Register Committee underlined that neither should Board members participate in and thus potentially influence the discussions on a programme/institution for which they have a conflict of interest.

Following the end of the Board's mandate in 2016, NCPA announced that they would replace one third of the current members, including the members who are rectors or presidents. While NCPA clarified how the Board is composed, the next external review of NCPA should cover the nomination and selection process for Board members.

Having considered the additional representation the Register Committee concurred with the review panel's conclusion that NCPA complies with the standard.

The Register Committee concurred with the conclusion of the panel that NCPA should formalise, in a 'code of ethics', the independence of the NAB from higher education institutions or other stakeholders.

ESG 3.7: External QA criteria and processes used by the agency

9. The review panel stated that NCPA publishes on its website the processes, criteria and procedures for its reviews. The Register Committee was, however, unable to find the published guidelines for the external reviews of educational programmes, the guidelines for the self-evaluation of educational programmes and the guidelines for the preparation of a report on the results of corrective actions.

The review panel stated that the Appeals Committee is formed by some of the members of the National Accreditation Board and recommended the establishment of an independent Appels Committee.

The Register Committee also noted that NCPA only published on its website the accreditation advice provided by the experts (p. 16), but not the final accreditation decisions taken by the National Accreditation Board.

NCPA explained in its additional representation that it has developed all required documents for its processes and procedures, but that some of these documents were being revised to align NCPA's procedures with the 2015 version of the ESG. NCPA added that it will make available a new set of standards in January 2016 and that it publishes full and summary reports of external evaluations, minutes of the National Accreditation Board and a register of accredited study programmes, which include the list on accredited programmes. The Register Committee could verify the publication of the list of accredited programmes.

Taking into account the recommendations of the review panel, NCPA stated that it has set up a new Appeals Committee in June 2015, independent from the National Accreditation Board and that new Regulations on the Appeals Committee were developed.

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The Register Committee sought further clarification on the procedure of appointing the Appeals Committee. In its response (e-mail of 15/10/2015) NCPA provided the Register Committee with NCPA's Regulations on Appeals Procedure. The Register Committee considered that the regulation appears to ensure independence in the work and nomination of the new Appeals Committee. Since the new arrangements have not yet been reviewed by an external review panel, the functioning of the appeals procedure should be addressed specifically in the next external review of NCPA. This issue has therefore been flagged.

Conclusion:

- 10. Based on the external review report and the considerations above, the Register Committee concluded that NCPA complies substantially with the ESG and therefore approved the application for inclusion on the Register.
- 11. NCPA's inclusion shall be valid until 30/06/20191.
- 12. The Register Committee underlined that NCPA is expected to make a Substantive Change Report once it has completed the revision of its standards and procedures (see under ESG 3.7), and published their new versions.
- 13. The following issues have been flagged for particular attention when considering a potential application for renewal of inclusion. NCPA is expected to address these issues specifically in its next self-evaluation report, setting out whether the issue has been resolved or indicating what progress has been made. NCPA is further responsible for informing the coordinator of the next external review and the review panel of the need to address these issues in the external review report.

ESG 2.6: Implementation of follow-up

It should be addressed whether the follow-up procedures were implemented consistently.

ESG 3.7: External QA criteria and processes used by the agency

It should be addressed whether NCPA has published all required documents for its processes and procedures.

The functioning of the new Appeals Committee should receive further attention.

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Inclusion is valid for five years from the date of the external review report, see §4.1 of the EQAR Procedures for Applications.